## IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION

1:11-md-02262-NRB

THIS DOCUMENT RELATES TO:

ALL CASES

[PROPOSED] ORDER GRANTING
MOTION FOR REQUEST FOR
INTERNATIONAL JUDICIAL
ASSISTANCE PURSUANT TO THE
HAGUE CONVENTION OF 18
MARCH 1970 ON THE TAKING OF
EVIDENCE ABROAD IN CIVIL OR
COMMERCIAL MATTERS —
CHRISTIAN BITTAR, MICHAEL
CURTLER, JAMES R. KING, DAVID
NICHOLLS, AND YVES PATUREL

The Court has reviewed Plaintiffs' letter requesting issuance of a Letters of Request to take the Testimony of Christian Bittar, Michael Curtler, James R. King, David Nicholls, and Yves Paturel in the United Kingdom, the supporting Declaration of James R. Martin, the proposed Letters of Request, and all other accompanying submissions. The Court GRANTS Plaintiffs' request.

Neither this Order, the transmission of the Letters of Request to the UK Special Master pursuant to the Hague Convention, any examination of documents by the UK Special Master, nor the terms of the Letters of Request (which are incorporated into this Order) shall constitute or operate as a waiver or admission of any argument, position, objection, allegation, claim, or defense of Plaintiffs or Defendants in the above-captioned action, including any defense to personal jurisdiction or venue that Defendants have raised or otherwise may have, or of the attorney-client privilege, the work product doctrine, or any

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other privileges, rights, protections, or prohibitions that may apply to that evidence under the law of the United Kingdom, the United States, the State of New York, or the law of any other applicable state.

Dated: New York, New York
November 27, 2023

SO ORDERED

Naomi Reice Buchwald

UNITED STATES DISTRICT JUDGE